

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

THE ESTATE OF KRISTINA ANN FIEBRINK,
By Special Administrator Nathaniel Cade, Jr.; THE
ESTATE OF ANGELICA M. FIEBRINK; JOSE D.
MARTINEZ JR.; and ROBERT MARTINEZ;

Plaintiffs,

v.

ARMOR CORRECTIONAL HEALTH
SERVICES, INC.; DR. KAREN RONQUILLO-
HORTON; BROOKE SHAIKH APNP;
VERONICA WALLACE LPN; BRITENY R.
KIRK, LPN; EVA CAGE, LPN; BRANDON
DECKER APNP; MILWAUKEE COUNTY;
DAVID A. CLARKE JR.; RICHARD R.
SCHMIDT; NANCY L. EVANS; KEVIN
NYKLEWICZ; LATISHA AIKENS; BRIAN
PIASECKI; JENNIFER MATTHEWS;
LATRAIL COLE; LATOYA RENFRO; JOHN
DOES 1-10; JOHN DOES 11-20; EVANSTON
INSURANCE COMPANY; WISCONSIN
HEALTH CARE LIABILITY INSURANCE
PLAN; and WISCONSIN COUNTY MUTUAL
INSURANCE CORPORATION,

Case No. 18-CV-832

Defendants.

**NOTICE OF MOTION AND MOTION FOR SUMMARY JUDGMENT
BY DEFENDANTS DR. KAREN RONQUILLO-HORTON AND WISCONSIN HEALTH
CARE LIABILITY INSURANCE PLAN**

Dr. Karen Ronquillo-Horton (“Dr. Horton”) and Wisconsin Health Care Liability Insurance Plan (WHCLIP) by their attorneys, move the Court, pursuant to Fed. R. Civ. P. 56, for an order of summary judgment dismissing the plaintiff’s remaining claims.

The grounds for this motion are that plaintiffs have failed to support their claims with evidence necessary and sufficient to proceed with their claims against Dr. Horton. The motion is

based on the accompanying Memorandum of Law, Proposed Findings of Fact, Declaration of Karen Ronquillo-Horton, M.D., and Declaration of Randall R. Guse with attached exhibits.

Plaintiffs are further notified that declarations and any other documents accompanying this motion are incorporated by reference herein. Any factual assertion in the declarations (and other admissible proof) submitted or referred to in support of the defendants' motion will be accepted by the judge as true unless you submit affidavits or other admissible documentary evidence contradicting such assertion. Failure to oppose the defendants' affidavits (or other admissible proof) with your own affidavits (or other admissible proof) may result in entry of judgment against you.

Dated at Waukesha this 8th day of March, 2019.

Respectfully Submitted,

**OTJEN, GENDELMAN, ZITZER,
JOHNSON & WEIR, S.C.**

By: s/ Randall R. Guse
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